

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**CRYSTAL MANNING as next friend of  
L.D., a minor, MARIAHLEE MANS AW as  
next friend of P.M., a minor, MELISSA  
HOLLINS as next friend of D.H., a minor, as  
wrongful death beneficiaries of BILLIE  
DAVIS, deceased, and RUBY LEE DAVIS,  
individually and as representative of the  
estate of BILLIE DAVIS, deceased,**  
*Plaintiffs,*

**v.**

**LASALLE CORRECTIONS LLC d/b/a  
LASALLE CORRECTIONAL CENTER,  
HARRIS COUNTY, and HARRIS COUNTY  
SHERIFFS OFFICE,**  
*Defendants.*

Case No. 4:23-cv-01115

**INITIAL DISCLOSURES  
PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 26**

**TO DEFENDANTS: LASALLE CORRECTIONS LLC d/b/a LASALLE  
CORRECTIONAL CENTER, HARRIS COUNTY, and their counsel of record: Marvin C.  
Moos and Joshua Anderson, HORNE ROTA MOOS, LLP, 2777 Allen Parkway, Suite 1200  
Houston, Texas 77019 and HARRIS COUNTY SHERIFFS OFFICE, AND THEIR  
COUNSEL OF RECORD: OFFICE OF THE HARRIS COUNTY ATTORNEY 1019 Congress Houston,  
Texas 77002:**

COME NOW, Plaintiffs CRYSTAL MANNING as next friend of L.D., a minor, MARIAHLEE MANS AW as next friend of P.M., a minor, MELISSA HOLLINS as next friend of D.H., a minor, as wrongful death beneficiaries of BILLIE DAVIS, deceased, and RUBY LEE DAVIS, individually and as representative of the estate of BILLIE DAVIS, deceased, by and through Counsel of Record, and hereby serves this, concerning the name, address and telephone number of persons who may be called as experts by Plaintiff and a brief statement of the topics the experts may discuss at trial. This is being done pursuant to Rule 26(a)(2), Fed.R.Civ.P., and the current Case Management Order.

**Rule 26(a)(1)(A)(i)** – The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support his or her claims or defenses, unless the use would be solely for impeachment:

<b>Name of Individual Likely to have Discoverable Information</b>	<b>Contact Information (Address and Telephone Number)</b>	<b>Subject Matter of Discoverable Information</b>
Crystal Manning as next friend of L.D., a minor, Mariahlee Mansaw as next friend of P.M., a minor, Melissa Hollins as next friend of D.H., a minor, as wrongful death beneficiaries of Billie Davis, deceased, and Ruby Lee Davis individually and as representative of the estate of Billie Davis, deceased c/o Jason C. Webster, Heidi O. Vicknair, Ryan S. MacLeod, and Clayton S. Quinn	WEBSTER VICKNAIR MACLEOD 6200 Savoy Drive, Suite 150 Houston, Texas 77036 Tel: (713) 581-3900	Plaintiffs
Harris County Sheriff Ed Gonzales, Individually, and in his Official Capacity as Sheriff, Harris County, and Harris County Sheriff's Office c/o Christian D. Menefee, Jonathan G.C. Fombonne, Natalie G. Deluca, Gregory Burnett, and Rachel Fraser	OFFICE OF THE HARRIS COUNTY ATTORNEY 1019 Congress Houston, Texas 77002 Tel: (713) 755-5101	Defendants
LaSalle Corrections, LLC and LaSalle Correctional Center, L.L.C. c/o Marvin C. Moos and Joshua Anderson	HORNE ROTA MOOS, LLP 2777 Allen Parkway, Suite 1200 Houston, Texas 77019 Tel: (713) 333-4500	Defendants
LaSalle EMS Employees/and or the Custodian of Records	247 Mars Drive Cotulla, Texas 78014 Tel: (830) 483-5166	Paramedics and staff have knowledge of the injuries sustained by decedent and may be called as non-retained experts regarding

		the same.
Hardtner Medical Center Employees/and or the Custodian of Records Including but limited to Dr. Daavid Easterling	1102 N Pine Road Urania, LA 71480 Tel: (318) 495-3131	Physicians and staff have knowledge of the injuries sustained by decedent and the Physicians and staff may be called as non- retained experts regarding the same.
Hernandez Funeral Home Employees/and or the Custodian of Records	800 Forth Street Rosenburg, Texas 77471 Tel: (281) 342-8803	Funeral Home
All Faiths Mortuary Employees/and or the Custodian of Records Including but limited to Dr. Paul B. Radelat	12 Farnham Park Houston, Texas 77024 Tel: (713) 201-7513	Mortician that conducted an autopsy on the decedent

**Rule 26(a)(1)(A)(ii)** – A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in his or her possession, custody, or control and may use to support his or her claims or defenses, unless the use would be solely for impeachment. (Please note that the disclosing party may either produce the documents, electronically stored information, and tangible things or fill in the table below.)

<b><u>Description by Category</u></b> <b>of Document, Electronically Stored Information, or Tangible Thing</b>	<b><u>Description by Location</u></b> <b>of Document, Electronically Stored Information, or Tangible Thing</b>
Death Certificate	Bate Stamped: DAVIS 000001
Independent Autopsy	Bate Stamped: DAVIS 000002-000004
Photos of Decedent	Bate Stamped: DAVIS 000005-000019
Hardtner Medical Center Medical Records	Bate Stamped: DAVIS 000020-000042
Funeral Home Invoices	Bate Stamped: DAVIS 000043-000044
Funeral Program	Bate Stamped: DAVIS 000045-000046
Houston Chronicle Article	Bate Stamped: DAVIS 000047-000049
Hardtner Medical Center Billing Records	Bate Stamped: DAVIS 000050-000055

Respectfully submitted,

**WEBSTER VICKNAIR MACLEOD**

By: /s/ Jason C. Webster

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*-And-*

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been forwarded to all counsel of record in compliance with the Texas Rules of Civil Procedure on this August 23, 2024.

/s/ Jason C. Webster

Jason C. Webster